

D-1A
IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION

JAMES EDWARD (“Dusty”) BROGDON, Jr.,	*	
as Executor of the Estate of Debra Sue Mills,	*	
deceased, and JAMES EDWARD BROGDON, Jr.,	*	
and RONALD BRIAN (“Rusty”) BROGDON,	*	
Individually and as surviving children of	*	CIVIL ACTION FILE
Debra Sue Mills,	*	
	*	
and	*	NO. 4:23-cv-00088-CDL
	*	
JAMES EDWARD BROGDON, Jr.,	*	
as Executor of the Estate of Herman Edwin Mills,	*	
deceased, and JASON EDWIN MILLS,	*	
Individually and as surviving child	*	
of Herman Edwin Mills,	*	
	*	
	*	
Plaintiffs,	*	
	*	
	*	
v.	*	
	*	
FORD MOTOR COMPANY,	*	
	*	
	*	
Defendant.	*	

PLAINTIFFS’ PROPOSED VERDICT FORM – PHASE 1

WE THE JURY find as follows:

A. Claim for compensatory damages

1. Do you find by a preponderance of the evidence that the 2015 F-250 pickup was defective and/or unreasonably dangerous and a proximate cause of Mr. Herman Mills’ injuries and resulting death? CHECK ONE

Yes _____

No _____

2. Do you find by a preponderance of the evidence that the 2015 F-250 pickup was defective and/or unreasonably dangerous and a proximate cause of Mrs. Debra Mills' injuries and resulting death? CHECK ONE

Yes _____

No _____

3. Do you find by a preponderance of the evidence that Ford Motor Company breached its duty to warn either before or after Ford sold the Mills' 2015 F250 truck and that failure was a proximate cause of Mr. Herman Mills' injuries and resulting death? CHECK ONE

Yes _____

No _____

4. Do you find by a preponderance of the evidence that Ford Motor Company breached its duty to warn either before or after Ford sold the Mills' 2015 F250 truck and that failure was a proximate cause of Mrs, Debra Mills' injuries and resulting death? CHECK ONE

Yes _____

No _____

B. Amounts of compensatory damages.

1. If you find for Plaintiffs as to either item 1, or item 2, or item 3, and you also find for Plaintiffs as to item 5, you must then find the amount of compensatory damages you award for the claims brought on behalf of Mr. Herman Mills.

Compensatory damages for all elements of pain & suffering:

\$ _____

Compensatory damages for the full value of the life of Mr. Herman Mills:

\$ _____

Compensatory damages for funeral and burial expenses for Mr. Herman Mills:

\$ _____

2. If you find for Plaintiffs as to either item 1, or item 2, or item 3, and you also find for Plaintiffs as to item 4, you must then find the amount of compensatory damages you award for the claims brought on behalf of Mrs. Debra Mills.

Compensatory damages for all elements of pain & suffering:

\$ _____

Compensatory damages for the full value of the life of Mrs. Debra Mills:

\$ _____

Compensatory damages for funeral and burial expenses for Mrs. Debra Mills:

\$ _____

C. Claim for punitive damages

Do you find that Plaintiffs have proven by clear and convincing evidence that Ford Motor Company's actions showed willful misconduct, malice, fraud, wantonness, oppression, *or* that entire want of care that would raise the presumption of conscious indifference to consequences? CHECK YES OR NO

YES _____

NO _____

D. Claim for expenses of litigation including attorneys fees:

Do you find that Ford Motor Company has acted in bad faith *or* has been stubbornly litigious *or* has caused Plaintiffs unnecessary trouble and expense? CHECK YES OR NO

YES _____

NO _____

SO SAY WE ALL

This _____ day of _____, 2025.

Foreperson

D-1B
IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION

JAMES EDWARD (“Dusty”) BROGDON, Jr.,	*	
as Executor of the Estate of Debra Sue Mills,	*	
deceased, and JAMES EDWARD BROGDON, Jr.,	*	
and RONALD BRIAN (“Rusty”) BROGDON,	*	
Individually and as surviving children of	*	CIVIL ACTION FILE
Debra Sue Mills,	*	
	*	
and	*	NO. 4:23-cv-00088-CDL
	*	
JAMES EDWARD BROGDON, Jr.,	*	
as Executor of the Estate of Herman Edwin Mills,	*	
deceased, and JASON EDWIN MILLS,	*	
Individually and as surviving child	*	
of Herman Edwin Mills,	*	
	*	
	*	
Plaintiffs,	*	
	*	
	*	
v.	*	
	*	
FORD MOTOR COMPANY,	*	
	*	
	*	
Defendant.	*	

PLAINTIFFS’ PROPOSED VERDICT FORM – PHASE 2

You have answered “yes” to the question whether punitive damages should be imposed against Ford.

Now it is your duty to state the amount of punitive damages which you find is sufficient to punish, *or* penalize, *or* deter Ford.

1. Amount of punitive damages:

A. Claim by the Estate of Mr. Herman Mills

After considering all of the evidence presented, including the evidence as to the degree of reprehensibility of Ford's conduct; the nature and degree of the harm caused and suffered; and Ford's size and financial status, WE THE JURY find, after due deliberation, that the amount of punitive damages necessary to sufficiently punish or penalize or deter Ford's conduct under Georgia law is the following amount:

\$ _____

B. Claim by the Estate of Mrs. Debra Mills

After considering all of the evidence presented, including the evidence as to the degree of reprehensibility of Ford's conduct; the nature and degree of the harm caused and suffered; and Ford's size and financial status, WE THE JURY find, after due deliberation, that the amount of punitive damages necessary to sufficiently punish or penalize or deter Ford's conduct under Georgia law is the following amount:

\$ _____

2. Plaintiffs' claim for expenses of litigation including attorneys fees.

You also answered "yes" to the question whether Ford is liable to reimburse Plaintiffs for their expenses of litigation including attorneys fees.

Now it is your duty to state the amount of such damages for which Ford should be liable.

For expenses of litigation: \$ _____

For attorneys fees: \$ _____

SO SAY WE ALL

This _____ day of _____, 2022.

Foreperson

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

JAMES EDWARD (“Dusty”) BROGDON,	*	
Jr., as Executor of the Estate of Debra Sue	*	
Mills, deceased, and JAMES EDWARD	*	
BROGDON, Jr., and RONALD BRIAN	*	
(“Rusty”) BROGDON, Individually and as	*	
surviving children of Debra Sue Mills,	*	
and	*	
JAMES EDWARD BROGDON, Jr., as	*	
Executor of the Estate of Herman Edwin	*	
Mills, deceased, and JASON EDWIN	*	CIVIL ACTION FILE
MILLS, Individually and as surviving child	*	NO. 4:23-cv-00088-CDL
of Herman Edwin Mills,	*	
	*	
Plaintiffs,	*	
	*	
v.	*	
	*	
FORD MOTOR COMPANY,	*	
	*	
Defendant.	*	

**ATTACHMENT D-2
FORD’S PROPOSED VERDICT FORM**

We, the jury, unanimously make the following findings:

I. Product Liability – Ford Motor Company

A. Do you find that Plaintiffs have proven, by a preponderance of the evidence, that the roof of the 2015 Ford F-250 in question was defective in design?

_____ YES _____ NO

If you answered “NO” to Question I(A), then sign the verdict on the last page and return to the courtroom.

If you answered “YES”, then proceed to Subparts B and C.

- B.** Was the defect in the design of the roof in the 2015 Ford F-250 a proximate cause of the injuries and death of Herman Mills?

_____ YES _____ NO

- C.** Was the defect in the design of the roof in the 2015 Ford F-250 a proximate cause of the injuries and death of Debra Sue Mills?

_____ YES _____ NO

If you answered "NO" to both Questions I(B) and I(C), then sign the verdict on the last page and return to the courtroom.

If you answered "YES" to Questions I(B) and/or I(C), then proceed to Section II.

II. Negligence – Debra Sue Mills

- A.** Do you find that Ford Motor Company has proven, by a preponderance of the evidence, that Debra Sue Mills was negligent in her operation of the Ford F-250 on the day of the incident in question?

_____ YES _____ NO

If you answered "NO" to Question II(A), then proceed to Section III.

If you answered "YES", then proceed to Subparts B and C.

- B.** Was Debra Sue Mills' negligence a proximate cause of the injuries and death of Herman Mills?

_____ YES _____ NO

- C.** Was Debra Sue Mills' negligence a proximate cause of her own injuries and death?

_____ YES _____ NO

Please proceed to Section III.

III. Compensatory Damages

We find the Plaintiffs' total compensatory damages to be as follows:

The full value of the life of Debra Sue Mills: \$_____

The value of conscious pain and suffering experienced by Debra Sue Mills, if any: \$_____

Debra Sue Mills' funeral costs: \$_____

The full value of the life of Herman Mills: \$_____

The value of conscious pain and suffering experienced by Herman Mills: \$_____

Herman Mills' medical expenses and funeral costs: \$_____

Please Proceed to Section IV.

IV. Apportionment

Allocate the relative fault for Plaintiffs' injuries and damages between:

Debra Sue Mills: _____%

Ford Motor Company: _____%

TOTAL: 100%

Please Proceed to Section V.

V. Punitive Liability

Do you find that Plaintiffs have proven, by clear and convincing evidence, that Ford Motor Company's actions in designing the roof of the 2015 Ford F-250 showed willful misconduct, malice, wantonness, oppression, or the entire want of care that would demonstrate a conscious indifference to consequences, such that punitive damages are authorized?

_____ YES _____ NO

So say we all, this _____ day of February, 2025.

Foreperson (please sign)

Print Name